

AFFIDAVIT

I, Timothy Hoffmann, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I submit this affidavit to establish probable cause to believe that in or about November 2019, Chakeshia WATTS and Jerry WATTS violated 21 U.S.C. § 856(a)(1) by unlawfully and knowingly using and maintaining a place located at 96 Cherry Street, Apartment #3, Saint Johnsbury, Vermont, for the purpose of distributing and using cocaine and cocaine base, Schedule II controlled substances.

2. I am assigned to the DEA's Burlington Resident Office (BRO). I was hired as a SA with DEA in 2012, and I completed my training in 2013. In connection with my duties and responsibilities as a SA, I have received extensive training in the field of narcotics investigation and enforcement. I have received training, both formal and informal, in the investigation of violations of controlled substance offenses, including attending several schools regarding general narcotics investigation. I completed the DEA Basic Agent Training Academy, located in Quantico, Virginia. I have also received specialized training related to the investigation of money laundering and other financial crimes related to drug trafficking. I have also participated in investigations relating specifically to the possession and distribution of cocaine base and cocaine, the drugs involved in this investigation and discussed herein. I have also participated in various aspects of investigatory work, including but not limited to undercover surveillance and undercover narcotics purchases, and I have participated in several narcotics-related arrests and the execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants, and I frequently utilize the services of informants and other confidential sources of information.

3. The information contained within this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation

PROBABLE CAUSE

4. On November 6, 2019, I presented an application for a federal search warrant to Chief United States District Judge Geoffrey Crawford, requesting authorization to search 96 Cherry Street, Apartment #3, Saint Johnsbury, Vermont, which Judge Crawford granted. A copy of the search warrant affidavit is attached as Exhibit 1, and its contents remain true and correct and are incorporated here.

5. On November 7, 2019, law enforcement encountered Chakeshia WATTS as she was attempting to get into the 2018 gray Ford Expedition referenced in Exhibit 1. During the encounter, which took place in a public parking lot near Dunkin Donuts in Saint Johnsbury, Vermont, WATTS reported that she was a user of cocaine base, and was found to be in possession of a pipe used to smoke cocaine base, a “push rod,”¹ a small metal box with suspected cocaine residue, and approximately 2.6 grams of suspected cocaine base. I conducted a field test of the suspected cocaine base, and it tested presumptive positive for cocaine. Following the

¹ A “push rod” is a small, long cylindrical object used to push cocaine base residue to the end of a pipe enabling a final “hit” of cocaine base from the pipe.

seizure of the suspected cocaine base, Chakesia WATTS was arrested.

6. During this encounter with Chakesia WATTS in the public parking lot, I seized her mobile phone as evidence. Following the execution of the search warrant, TFO Scalise called cellular number 802-278-1242, which was provided by the Source of Information referenced in the Affidavit in support of the Search Warrant Application for 96 Cherry Street, Apartment #3, and I observed the phone seized from Chakesia WATTS activate and receive an incoming call from TFO Scalise's phone. As described by the Source of Information, this phone number was used to arrange narcotics transactions with Chakesia WATTS.

7. The driver of the Expedition was also arrested for possession of suspected cocaine, which was packaged in a wax glassine envelope. I field-tested the suspected cocaine seized from the driver, and it field-tested presumptive positive for the presence of cocaine. Special Agent Kevin Kadish and TFO Christopher Matott conducted a post-arrest interview of the driver. Among other things, the driver advised it was living at 96 Cherry Street, Apartment #3, for approximately the past month. During that time the driver was obtaining narcotics from an individual identified as CM at 96 Cherry Street, Apartment #3.

8. Shortly after the traffic stop, members of the DEA BRO executed the search warrant at 96 Cherry Street, Apartment #3, Saint Johnsbury, Vermont. Agents encountered Jerry WATTS near the closet in the living room. Inside the closet, on the floor, agents located a plastic bag inside of which were numerous wax glassine envelopes, and two knotted plastic bags containing suspected controlled substances. In the bathroom, there was a mop bucket, and in that bucket, agents located a Newport cigarette box, inside of which were 8 glassine envelopes containing suspected controlled substances. In the kitchen, agents located a pipe used to smoke cocaine base, and a box containing numerous small plastic zip-lock baggies that I recognize to be

consistent with baggies used to package controlled substances. In a child's bedroom, the agents located a pipe used to smoke cocaine base and materials used for packaging narcotics. In numerous locations in the house, agents observed burnt "chore boy,"² indicative that cocaine base had been smoked at the residence. It should be noted that the suspected cocaine seized from the driver of the Expedition was packaged in a manner consistent with the cocaine packaged in the Newport cigarette box and the wax glassine envelopes found in the closet.

9. I field-tested the suspected controlled substances seized from the bathroom, and it field-tested presumptive positive for the presence of cocaine. I also field-tested the suspected controlled substances seized from the living room closet, and it field-tested presumptive positive for the presence of cocaine. The total weight of the two bags of suspected cocaine from the living room closet weighed approximately 5 grams.

10. I interviewed Jerry WATTS after his arrest. WATTS stated that he and Chakeshia WATTS had lived at the 96 Cherry Street, Apartment #3 residence for over two years. Jerry WATTS also admitted that he has been an active user of cocaine since approximately 2004.

11. In addition, an individual identified as CM was located in the bathroom of 96 Cherry Street, Apartment #3 during the execution of the search warrant. CM had active arrest warrants in the State of Vermont and was arrested. TFO Frank Scalise and ATF Special Agent Brian Wood conducted a post-arrest interview of CM. During this post-arrest interview, he acknowledged being a user of drugs and accepted responsibility for the drugs found in the bathroom. CM also acknowledged staying at 96 Cherry Street, Apartment #3 because the

² "Chore boy" is a brand of scouring pad that is also used to facilitate the smoking of cocaine base.

previous place he was staying had too many illegal activities.

CONCLUSION

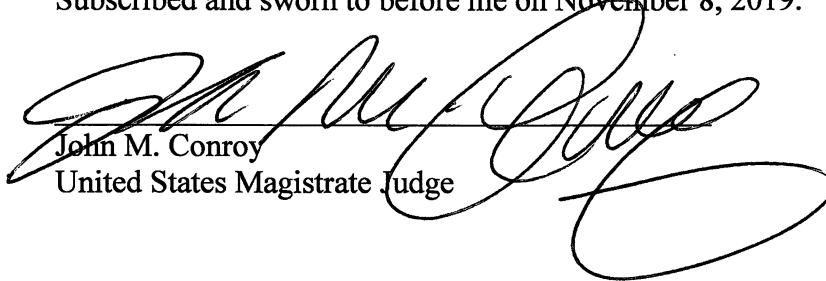
12. Based on the foregoing, I submit there is probable cause to believe that in or about November 2019, Chakeshia WATTS and Jerry WATTS violated 21 U.S.C. § 856(a)(1) by unlawfully and knowingly using and maintaining a place located at 96 Cherry Street, Apartment #3, Saint Johnsbury, Vermont, for the purpose of distributing and using cocaine and cocaine base, Schedule II controlled substances.

Respectfully submitted,



Special Agent Timothy Hoffmann
Drug Enforcement Administration

Subscribed and sworn to before me on November 8, 2019.



John M. Conroy
United States Magistrate Judge